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October 15, 2004

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

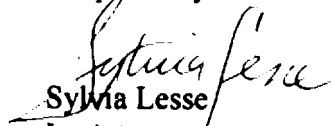
Re: MobileTel, LLC
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Order to Stay,¹ MobileTel, LLC hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,


Sylvia Lesse
Its Attorney

Enclosure

cc: John Muleta, Chief, Wireless Telecommunications Bureau
David Solomon, Chief, Enforcement Bureau
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division
Eugenie Barton, Public Safety & Critical Infrastructure Division
Best Copy & Printing, Inc.
Mark J. Boudreaux, Terrebonne Parish Communications District

¹ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

MOBILETEL, LLC
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
Third Quarter, 2004

MobileTel, LLC ("MobileTel" or "Company"), pursuant to the Commission's Order to Stay,¹ hereby provides an interim report to assist the Commission in monitoring MobileTel's progress in deploying Phase II E911 technology.²

I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

MobileTel has received valid Phase I requests from Lafourche, St. Mary and Terrebonne parishes and, pursuant to those requests, provides Phase I service to these parishes. The Company has not received a Phase I request from the other jurisdiction that the Company serves, Grand Isle. MobileTel received a Phase II request from one of these jurisdictions, Terrebonne Parish, on July 6, 2004.

II. The carrier's specific technology choice:

As reported, the Company has determined that a network-based Phase II solution is not economically or technically feasible. Accordingly, as reported, the Company has initiated the process of converting its analog/TDMA system to a CDMA network that supports a handset-based solution.

III. Status on ordering and/or installing necessary network equipment:

On August 25, 2004, the Commission consented to the application for transfer of control of MobileTel from SJI, LLC to ALLTEL Communications, Inc. (see Public Notice Report Number 1927, File No. 0001823402 (rel. Sept. 1, 2004)). The transaction has not yet been consummated, but the parties anticipate closing within a month.

IV. Information Regarding Availability of ALI-Capable Handsets

Please see response to Section III above.

¹ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers; Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

² On August 1, 2003, MobileTel requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, MobileTel committed to providing quarterly progress reports. On November 10, 2003, MobileTel supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Waiver of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"), and filed a quarterly report on January 15, 2004, April 15, 2004 and July 15, 2004. Accordingly, this instant report serves as the Company's fifth quarterly progress report.

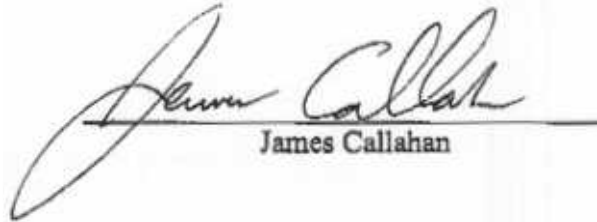
V. The estimated date on which Phase II service will first be available in the carrier's network:

Please see response to Section III above.

DECLARATION OF JAMES CALLAHAN

I, James Callahan, President of MobileTel, LLC, do hereby declare under penalty of perjury that I have read the foregoing "MobileTel, LLC E911 Phase II Implementation Report for Tier III Carriers, Third Quarter, 2004" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

10/15/04
Date


James Callahan